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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

July 29, 1997

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Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, D.C. 20554

Re: Ex Parte Presentation--WT Docket No. 97-82

Dear Mr. Caton:

On July 28, 1997, representatives of Alpine PCS, Inc. ("Alpine"), met with Rudy Baca to discuss issues in the above-referenced proceeding. Alpine was represented by Robert F. Broz and the undersigned counsel. The views expressed by Alpine's representatives were previously presented to the Commission in Alpine's written filings in the above-referenced proceeding. The enclosed new material was also distributed by Alpine at the meeting.

In accordance with Section 1.1206 of the Commission's rules, an original and two copies of this filing are being submitted to you today. Please direct any questions concerning this matter to the undersigned.

Very truly yours,


Gerald S. McGowan
Thomas Gutierrez

Enclosure
TG:cms

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**Alpine PCS, Inc.
(C and F-Block Financing Plan)
Presentation
To
Federal Communications Commission**

**Robert F. Broz, President
Alpine PCS, Inc.**

**Gerald S. McGowan
Thomas Gutierrez
Lukas, McGowan, Nace &
Gutierrez, Chartered**

The State of C-Block Licensees – A Need For Action

I. Alpine PCS, Inc.

- **Long Term Cellular Operator**
- **PCS C and F-Block Licensee**
 - **Markets Include Santa Barbara, San Luis Obispo, Hyannis, Bakersfield, Salinas, Escanaba, Sault Saint Marie, Petosky , Alpena, Saginaw, Traverse City**
- **No Reliance on Capital Markets; Vendor Financing Needed**

II. Alpine's Viability is Tied to C-Block Viability Generally

- **Alpine Can Survive – Unless the C-Block Generally Falts**

- **Alpine's Bids Were Reasonable Given the Markets at Issue and the Bidding Climate; A and B-Block Prices Were Low**
- **Alpine Has Undertaken Substantial System Development Efforts**
 - **Preliminary System Design is Complete**
 - **Site Selection Has Begun**
 - **First Round Vendor Proposals Have Been Received**
 - **Final Vendor Selection is Under Way in Certain Markets**
 - **Vendor Financing is Contingent Upon C-Block Viability**
- **If Major C-Block Players Fall, Alpine's Financial Picture Becomes Far More Complicated**

- **Competitive Service With PBMS and ComCast (Sprint) Would Not be Possible**
- **There Would be No Significant Roaming Revenues**

III. Designated Entity Relief Necessary

- **Reduce Interest Rate, From 7% to 6.5%, to Create Regulatory Parity Within the C-Block**
- **Permit Meaningful Subordination to Facilitate Vendor and Working Capital Financing**
- **Maintain Bankruptcy Protection; To Do Otherwise Threatens Vendor Financing**
- **Permit Interest Payment Deferral for Up to Five Years – In Order to Permit Expediting Construction**
- **No Amnesty Proposal is Viable; Reauction Delays Kills C-Block Viability**

IV. Concluding Comments

- **The Above Should be Sufficient to Ensure C-Block Viability**
- **Without These Changes, Prudent Business Judgement Demands Consideration of License Return as an Option to Further Entrepreneurial Investment**
- **Whatever the Commission Decides, Do it Quickly!**